

## **EXHIBIT B**

## Shawn Shearer

---

**From:** Shawn Shearer <shawn@shearerlaw.pro>  
**Sent:** Sunday, March 11, 2018 2:52 PM  
**To:** Eidelman, Gary B.  
**Cc:** Cooper, Gillian A.; David Zeitlin  
**Subject:** Re: Depositions

Gary - I feel for your situation and hope the best for your family.

Arrangements have already been made for Plaintiffs travel to Omaha on Tuesday, conference rooms reserved, reporters and videographers scheduled for Wednesday morning. Plaintiff has made professional decisions around this date, a date that you both chose and confirmed to the Court in your Motion for Protective Order filed on March 6, 2018. The small businesses in Omaha, who also agreed to your chosen time and date, must now be told for the second time in a month that their work to organize and reserve their time is fornaught with only a few days to reschedule their deposition time in Omaha for other revenue opportunities. Any costs of a cancellation should be paid by Defendants. Not to mention Judge Bloom's order in the matter of your Motion for Protective Order, granting Plaintiff the deposition of Ms. Voycheske as scheduled.

I have already scheduled most of my time for March and was planning to work Mr. Bisignano in, out if deference to his many responsibilities as CEO of First Data. You refused to produce Ms. Voycheske on February 23rd, 2018, stating that two days notice was insufficient given busy schedules. Now, with two days notice, Saul Ewing, a firm of 800 lawyers with all the resources needed to cover defense of two deponents on one day, requests a delay for two or three weeks on two days notice.

As an accommodation, Plaintiff is willing to limit Wednesdays testimony to three hours total, with an expected two hours with Ms. Voycheske and one hour with Ms. Steffen, with both depositions then continued until a later time (mid-April).

You can send a different Saul Ewing partner, Ms. Cooper, or another senior associate. Or, First Data's local counsel who have defended Ms. Voycheske's prior depositions can attend. I can arrange for you to call-in, or FaceTime, as your email indicates that you have an iPhone. It can be your decision on whether the 9 a.m or 2 p.m. already scheduled times will be used for both depositions will be used.

In return, Plaintiff would like your response to his previous request for available times to depose Frank Bisignano within 30 days, which is by April 5th based on Plaintiff's original request. As I indicated, I am willing to travel anywhere in the continental United States to fit the deposition into Mr. Bisignano's travel schedule.

Please promptly get back to me so that the arrangements can be made.

Shawn Shearer  
Law Office of Shawn Shearer  
(214) 434-1594

On Mar 11, 2018 12:01 PM, "Eidelman, Gary B." <[Gary.Eidelman@saul.com](mailto:Gary.Eidelman@saul.com)> wrote:  
Shawn,

I wanted to give you a heads up with as much notice as possible. We had to come to Pittsburgh this weekend

because my mother in law, who has been very ill for 4 years, is close to death now. I suspect she will be gone within the next day or two which means the funeral will be shortly thereafter. I was planning on flying to Omaha late tomorrow night to defend the depositions but I need to cancel my flight. Accordingly, I would like us to reschedule the depositions for this coming Wednesday. Perhaps we can look in the next couple of weeks for dates that work. Thank you in advance for your understanding.

Gary B. Eidelman  
Sent from my iPhone

"Saul Ewing Arnstein & Lehr LLP ([saul.com](http://saul.com)) " made the following annotations:

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+~~~~~+

## Shawn Shearer

---

**From:** Shawn Shearer <shawn@shearerlaw.pro>  
**Sent:** Friday, March 16, 2018 3:06 PM  
**To:** 'Cooper, Gillian A.'  
**Cc:** 'Eidelman, Gary B.'  
**Subject:** Frank Bisignano Deposition

Gillian – Gary indicated you would be working this week on providing available dates for the deposition of Mr. Bisignano, and that you would be back to me this week with those dates. Please advise me of his availability.

### Shawn E. Shearer

The Law Office of Shawn Shearer, P.C.  
3839 McKinney Avenue #155-254  
Dallas, TX 75204  
(214) 434-1594  
[www.shearerlaw.pro](http://www.shearerlaw.pro)

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## Shawn Shearer

---

**From:** Cooper, Gillian A. <Gillian.Cooper@saul.com>  
**Sent:** Friday, March 16, 2018 3:06 PM  
**To:** Shawn Shearer  
**Subject:** Automatic reply: Frank Bisignano Deposition

I will be traveling on business from 3/16-4/1. During this time I will have limited access to email and voicemail. If you need immediate assistance, please contact Joan Lee at (609) 452-5051. Thank you.

Gillian A. Cooper  
Saul Ewing Arnstein & Lehr LLP

"Saul Ewing Arnstein & Lehr LLP (saul.com) " made the following annotations:

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**Shawn Shearer**

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**From:** Eidelman, Gary B. <Gary.Eidelman@saul.com>  
**Sent:** Friday, March 16, 2018 3:06 PM  
**To:** Shawn Shearer  
**Subject:** Automatic reply: Frank Bisignano Deposition

My wife's mother passed away so I will be working remotely for the rest of the week. I may be delayed in responding to your email. If you need immediate assistance, please contact my assistant Roseanne Lantz at roseanne.lantz@saul.com or (410) 332-8933. Thank you.

"Saul Ewing Arnstein & Lehr LLP (saul.com) " made the following annotations:

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## Shawn Shearer

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**From:** Shawn Shearer <shawn@shearerlaw.pro>  
**Sent:** Monday, March 19, 2018 1:52 PM  
**To:** 'Eidelman, Gary B.'  
**Cc:** 'Cooper, Gillian A.'  
**Subject:** RE: Depositions of Jennifer Voycheske and Amy Steffen

Gary – After going through the documents you have produced so far (which are scant), and because the corporate reporting and authority structure remains unclear and undisclosed, the only proper order for deposing the officers and employees of First Data with any efficiency is to work from the top down. Mr. Bisignano's deposition needs to be set first. Then, I will depose Mr. Charron and Ms. Johnson and in Atlanta. Following that, we need a day or two in New York to depose Mr. Marino, Ms. Whalen (I assume you know her whereabouts), Mr. Keyes, Mr. King (my understanding is that Mr. Rosman will be able to locate Mr. King), and 30(b)(6) witnesses on accounting, disability benefit, and IT issues. First, I must understand First Data's internal corporate structure, and internal human resources and benefits operations and authority, and related IT systems. For efficiency in the discovery process and to avoid unnecessary continuances of depositions and inconvenience for all involved, Mr. Bisignano and the others named above must come before any discussion of detailed human resources operational issues with Ms. Voycheske and Ms. Steffen in Omaha.

Step 1, as I have repeatedly asked, is for you to let me know where and when Mr. Bisignano is available for deposition.

Please advise me of where the 30(b)(6) witnesses are located to address the following issues (i) financial, tax, and general ledger accounting for salary, wages, benefits, STD, and LTD, and knowledge of the process for drafting, and the content of, the company's public SEC disclosures within the footnotes to financial statements and within the Management's Discussion and Analysis sections of the 10-Qs for 2017 and the recently filed 10-K for the 2017 annual period; and (ii) the information technology systems utilized by First Data in connection with its accounting systems, leave management systems, employee benefit systems, and the systems and accounts referred to as "GOOD", 1DC, Hagerstown Mainframe (North/South/Concord/BANA), and Denver Mainframe (SY1/EFTPS); and (iii) the terms and conditions of First Data's employee policies and procedures, in particular, the FMLA, ADA, disability benefits, payroll processing, and life insurance benefits, including familiarity with First Data's outsourcing of any of these functions and First Data's contacts and agreements with outsourced services; and (iv) an individual familiar with the online/social media procedures for employment opportunity postings by First Data (including without limitation, internal posting, Tweets, employment aggregators such as Monster and Indeed, etc.).

Please advise me of a date, after Mr. Bisignano's deposition, that Ms. Johnson and Mr. Charron will be available for deposition in Atlanta, and when the other witnesses in New York will be available for depositions.

After this process is completed, we will be able to schedule depositions in Omaha, to include Ms. Voycheske and Ms. Steffen, along with any other witnesses within First Data's operations at the Omaha facility discovered during the examinations of the others previously described.

### Shawn E. Shearer

The Law Office of Shawn Shearer, P.C.  
3839 McKinney Avenue #155-254  
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[www.shearerlaw.pro](http://www.shearerlaw.pro)

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---

**From:** Eidelman, Gary B. [mailto:Gary.Eidelman@saul.com]  
**Sent:** Monday, March 19, 2018 12:45 PM  
**To:** 'Shawn Shearer' <shawn@shearerlaw.pro>  
**Cc:** Cooper, Gillian A. <Gillian.Cooper@saul.com>; Eidelman, Gary B. <Gary.Eidelman@saul.com>  
**Subject:** Depositions of Jennifer Voycheske and Amy Steffen

Shawn:

Would either Tuesday, April 17, 2018 or Friday, April 20, 2018 work for you to take the depositions of Jennifer Voycheske and Amy Steffen in Omaha? Please let me know so that I can lock dates in on the calendar. I am working on securing a date for you to take Frank Bisignano's deposition as you have requested.



**Gary B. Eidelman**  
**SAUL EWING ARNSTEIN & LEHR LLP**  
500 E. Pratt Street  
Suite 900 | Baltimore, MD 21202-3133  
Tel: 410.332.8975 | Fax: 410.332.8976 | Mobile: 410.303.8832  
[Gary.Eidelman@saul.com](mailto:Gary.Eidelman@saul.com) | [www.saul.com](http://www.saul.com)



Follow our blog, *WISE: Workplace Initiatives and Strategies for Employers*, [here](#)

\* Please note that our Firm name and my email address have changed.

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## Shawn Shearer

---

**From:** Shawn Shearer <shawn@shearerlaw.pro>  
**Sent:** Friday, March 23, 2018 12:04 PM  
**To:** 'Eidelman, Gary B.'  
**Cc:** 'Cooper, Gillian A.'; David Zeitlin  
**Subject:** Deposition Scheduling

Gary – Another week has gone by with no movement on the depositions. I understand your situation, but it has been two weeks, and my last e-mail received an out-of-office from Gillian indicating that she was out of the office through the beginning of April. The discovery process has been delayed more than three weeks at this point.

Let's simplify the project. Let's start with answers to these two questions:

- 1) When and where is Frank Bisignano available for deposition the first two weeks of April (this request has been outstanding for nearly a month).
- 2) Where are the 30(b)(6) witnesses located that can address the issues in the below e-mail (accounting, financial disclosures, benefits, IT systems). I want to try to notice the deposition for a location that is convenient for the witness.

If I cannot get answers to these questions, I am just going to start noticing depositions without your input. The non-responsiveness for weeks is not a good faith effort to participate in the discovery process. Your firm has plenty of lawyers (800+) to cover in your and Gillian's absence.

After these two questions can be answered, we can then move on to scheduling the other witnesses. In addition to those named in the e-mail below, I am also going to depose Robin Ording.

Please respond by the end of the day Monday, March 26<sup>th</sup>, so I can start making plans to arrange for the depositions, travel, documents, etc.

### Shawn E. Shearer

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**To:** 'Eidelman, Gary B.' <Gary.Eidelman@saul.com>  
**Cc:** 'Cooper, Gillian A.' <Gillian.Cooper@saul.com>  
**Subject:** RE: Depositions of Jennifer Voycheske and Amy Steffen

Gary – After going through the documents you have produced so far (which are scant), and because the corporate reporting and authority structure remains unclear and undisclosed, the only proper order for deposing the officers and employees of First Data with any efficiency is to work from the top down. Mr. Bisignano's deposition needs to be set first. Then, I will depose Mr. Charron and Ms. Johnson and in Atlanta. Following that, we need a day or two in New York to depose Mr. Marino, Ms. Whalen (I assume you know her whereabouts), Mr. Keyes, Mr. King (my understanding is that Mr. Rosman will be able to locate Mr. King), and 30(b)(6) witnesses on accounting, disability benefit, and IT issues. First, I must understand First Data's internal corporate structure, and internal human resources and benefits operations and authority, and related IT systems. For efficiency in the discovery process and to avoid unnecessary continuances of depositions and inconvenience for all involved, Mr. Bisignano and the others named above must come before any discussion of detailed human resources operational issues with Ms. Voycheske and Ms. Steffen in Omaha.

Step 1, as I have repeatedly asked, is for you to let me know where and when Mr. Bisignano is available for deposition.

Please advise me of where the 30(b)(6) witnesses are located to address the following issues (i) financial, tax, and general ledger accounting for salary, wages, benefits, STD, and LTD, and knowledge of the process for drafting, and the content of, the company's public SEC disclosures within the footnotes to financial statements and within the Management's Discussion and Analysis sections of the 10-Qs for 2017 and the recently filed 10-K for the 2017 annual period; and (ii) the information technology systems utilized by First Data in connection with its accounting systems, leave management systems, employee benefit systems, and the systems and accounts referred to as "GOOD", 1DC, Hagerstown Mainframe (North/South/Concord/BANA), and Denver Mainframe (SY1/EFTPS); and (iii) the terms and conditions of First Data's employee policies and procedures, in particular, the FMLA, ADA, disability benefits, payroll processing, and life insurance benefits, including familiarity with First Data's outsourcing of any of these functions and First Data's contacts and agreements with outsourced services; and (iv) an individual familiar with the online/social media procedures for employment opportunity postings by First Data (including without limitation, internal posting, Tweets, employment aggregators such as Monster and Indeed, etc.).

Please advise me of a date, after Mr. Bisignano's deposition, that Ms. Johnson and Mr. Charron will be available for deposition in Atlanta, and when the other witnesses in New York will be available for depositions.

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**Sent:** Monday, March 19, 2018 12:45 PM

**To:** 'Shawn Shearer' <[shawn@shearerlaw.pro](mailto:shawn@shearerlaw.pro)>

**Cc:** Cooper, Gillian A. <[Gillian.Cooper@saul.com](mailto:Gillian.Cooper@saul.com)>; Eidelman, Gary B. <[Gary.Eidelman@saul.com](mailto:Gary.Eidelman@saul.com)>

**Subject:** Depositions of Jennifer Voycheske and Amy Steffen

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**Gary B. Eidelman**  
**SAUL EWING ARNSTEIN & LEHR LLP**  
500 E. Pratt Street  
Suite 900 | Baltimore, MD 21202-3133  
Tel: 410.332.8975 | Fax: 410.332.8976 | Mobile: 410.303.8832  
[Gary.Eidelman@saul.com](mailto:Gary.Eidelman@saul.com) | [www.saul.com](http://www.saul.com)



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*\* Please note that our Firm name and my email address have changed.*

"Saul Ewing Arnstein & Lehr LLP (saul.com)" has made the following annotations:

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**Shawn Shearer**

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**From:** Eidelman, Gary B. <Gary.Eidelman@saul.com>  
**Sent:** Friday, March 23, 2018 12:04 PM  
**To:** Shawn Shearer  
**Subject:** Automatic reply: Deposition Scheduling

I am out of the office on business so I may be delayed in responding to your email. If you need immediate assistance, please contact my assistant Roseanne Lantz at roseanne.lantz@saul.com or (410) 332-8933. Thank you.

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**To:** Shawn Shearer  
**Subject:** Automatic reply: Deposition Scheduling

I will be traveling on business from 3/22-4/1. During this time I will have limited access to email and voicemail. If you need immediate assistance, please contact Joan Lee at (609) 452-5051. Thank you.

Gillian A. Cooper  
Saul Ewing Arnstein & Lehr LLP

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**Sent:** Friday, March 23, 2018 12:04 PM  
**To:** Shawn Shearer  
**Subject:** Automatic reply: Deposition Scheduling

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## Shawn Shearer

---

**From:** Cooper, Gillian A. <Gillian.Cooper@saul.com>  
**Sent:** Tuesday, March 27, 2018 11:43 AM  
**To:** Shawn Shearer  
**Subject:** Automatic reply: Deposition Scheduling

I will be traveling on business from 3/26-4/1. During this time I will have limited access to email and voicemail. If you need immediate assistance, please contact Joan Lee at (609) 452-5051. Thank you.

Gillian A. Cooper  
Saul Ewing Arnstein & Lehr LLP

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**Shawn Shearer**

---

**From:** Cooper, Gillian A. <Gillian.Cooper@saul.com>  
**Sent:** Tuesday, April 10, 2018 2:51 PM  
**To:** Shawn Shearer  
**Subject:** Automatic reply: Barger v First Data - First Supplement to Barger Responses to FD Interrogatories

I am out of the office in meetings today. During this time I will have limited access to email and voicemail. If you need immediate assistance, please contact Joan Lee at (609) 452-5051. Thank you.

Gillian A. Cooper  
Saul Ewing Arnstein & Lehr LLP

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## Shawn Shearer

---

**From:** Cooper, Gillian A. <Gillian.Cooper@saul.com>  
**Sent:** Wednesday, April 11, 2018 3:33 PM  
**To:** Shawn Shearer  
**Subject:** Automatic reply: Letter to Shawn Shearer re deposition dates.DOCX

I am out of the office in meetings today. During this time I will have limited access to email and voicemail. If you need immediate assistance, please contact Joan Lee at (609) 452-5051. Thank you.

Gillian A. Cooper  
Saul Ewing Arnstein & Lehr LLP

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**Shawn Shearer**

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**From:** Cooper, Gillian A. <Gillian.Cooper@saul.com>  
**Sent:** Friday, April 13, 2018 10:57 AM  
**To:** Shawn Shearer  
**Subject:** Automatic reply: Deposition Scheduling

I am out of the office today, Friday, April 13, 2018. During this time I will have limited access to email and voicemail. If you need immediate assistance, please contact Joan Lee at (609) 452-5051. Thank you.

Gillian A. Cooper  
Saul Ewing Arnstein & Lehr LLP

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**From:** Cooper, Gillian A. <Gillian.Cooper@saul.com>  
**Sent:** Friday, April 27, 2018 3:58 PM  
**To:** Shawn Shearer  
**Subject:** Automatic reply: Barger v. First Data et al., 1:17-cv-04869 - Request for Production Set Three

I will be traveling from Friday, April 27th, through Monday, April 30th. During this time I will have limited access to email and voicemail. If you need immediate assistance, please contact Joan Lee at (609) 452-5051. Thank you.

Gillian A. Cooper  
Saul Ewing Arnstein & Lehr LLP

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**Shawn Shearer**

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**From:** Eidelman, Gary B. <Gary.Eidelman@saul.com>  
**Sent:** Thursday, May 03, 2018 1:37 PM  
**To:** Shawn Shearer  
**Subject:** Automatic reply: Document Production Custodian Question (Follow-Up and New Custodian Question)

I will be in Canada speaking at a confernce so I may be delayed in responding to your email. If you need immediate assistance, please contact my assistant Roseanne Lantz at roseanne.lantz@saul.com or (410) 332-8933. Thank you.

"Saul Ewing Arnstein & Lehr LLP (saul.com) " made the following annotations:

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